

EXHIBIT C

Subject: Re: Flint: Challenges to VNA's Confidential Designations

Date: Friday, August 11, 2023 at 6:05:49 PM Eastern Daylight Time

From: Corey Stern

To: Devine, Alaina N.

CC: Melanie Daly, Campbell, James M., molsen@mayerbrown.com, McElvaine, Bryan D., Kramer, Kelly, gjordt@mayerbrown.com, Silverman, Kristin, Dupre, Kristin M., Moshe S. Maimon, Jerome Block, Hunter Shkolnik, Patrick Lenciotti

Alaina -

Thanks for your email.

For the correspondence we sent on July 28, 2023, we can file our Notice on the docket tomorrow.

So

please let us know if you are available for a meet and confer today or tomorrow.

Not only did we send the communication thirteen days ago, but we also requested the issue generally be placed on the agenda for Wednesday because we feel strongly that the process outlined in the subject order is inefficient.

We are happy to meet and confer in good faith, but we are not willing to delay our filing simply because you waited until 24 hours before we could file the Notice to reach out. We can limit this particular meet and confer to that communication.

We can confer on the second letter before August 17, when our Notice as to the letter can be filed.

For our third letter, we can confer before August 22, when our Notice as to that letter is due.

I can be free anytime this evening or anytime tomorrow.

We plan to file the Notice tomorrow, but we are willing to wait until 5:00 pm to do so.

The first letter covered those documents the Court recently reviewed in camera, so you should be familiar with them.

Let me know what works for you.

Best,

Corey M. Stern
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On Aug 11, 2023, at 5:15 PM, Devine, Alaina N. <ADevine@campbell-trial-lawyers.com> wrote:

Corey,

We are in receipt of your three letters, dated August 8, August 3, and July 29, challenging VNA's confidential designations for a variety of documents over several productions. We are evaluating these requests and request a meet and confer on this issue. Please let us know if you have availability to discuss this next week, perhaps on Wednesday.

Thank you,

Alaina N. Devine
Campbell Conroy & O'Neil
Professional Corporation

<image001.jpg>

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From: Corey Stern <CStern@levylaw.com>
Sent: Tuesday, August 8, 2023 4:03 PM
To: molsen@mayerbrown.com; Campbell, James M. <jmcampbell@Campbell-trial-lawyers.com>

Cc: Melanie Daly <mdaly@levylaw.com>; Ted Leopold <tedjleopold@gmail.com>; Jordan Connors <jconnors@susmangodfrey.com>; Steve Morrissey <smorrissey@susmangodfrey.com>; Paul Novak <pnovak@weitzlux.com>; Hunter Shkolnik <Hunter@nsprlaw.com>; Patrick Linciotti <P.Linciotti@napolilaw.com>; Hunter Shkolnik <Hunter@napolilaw.com>; Richard Kuhl <KuhlR@michigan.gov>; Margaret Bettenhausen <BettenhausenM@michigan.gov>; TMendel <TMendel@bsdd.com>; Bill Kim <wkim@cityofflint.com>; Sheldon Klein <klein@butzel.com>; Rick Berg <Bergf@butzel.com>; Wayne B. Mason <wayne.mason@faegredrinker.com>; David C. Kent <david.kent@faegredrinker.com>; Philip Erickson <PErickson@plunkettcooney.com>; Susan Smith <SSmith@bdlaw.com>; Brian MacDonald <bmacdonald@ccglawyers.com>; Todd Weglarz <twe glarz@fiegerlaw.com>; Donald Dawson <d.dawson@fiegerlaw.com>; Michael L. Williams <Michael.L.Williams@usdoj.gov>; Eric A. Rey <Eric.A.Rey@usdoj.gov>; Devine, Alaina N. <A.Devine@Campbell-trial-lawyers.com>; Dupre, Kristin M. <KDUPRE@Campbell-trial-lawyers.com>; Campbell, Richard P. <rpcampbell@Campbell-trial-lawyers.com>; Ringstad, Andreas <aringstad@campbell-trial-lawyers.com>; O'Donnell, Jack J. <JODonnell@CampbellTrialLawyers.com>; Penhallegon, John R. <jpenhallegon@campbelltriallawyers.com>; Chris Muha <Cmuha@kaiserdillon.com>; Howe, Christopher R. <chowe@Campbell-trial-lawyers.com>; Fletcher, Christopher D. <CFletcher@campbell-trial-lawyers.com>; Cahill, William C. <WCahill@campbell-trial-lawyers.com>; Kelly Kramer <kkramer@mayerbrown.com>; Kristin Silverman <KSilverman@mayerbrown.com>; Ter Molen, Mark <MTerMolen@mayerbrown.com>; William Sinnott <WSinnott@mayerbrown.com>; Minh Olivier Nguyen-Dang <MN guyen-Dang@mayerbrown.com>; Chris Weld <cweld@toddweld.com>; Thompson, Craig S. <c.thompson@sullivanwardlaw.com>; travis.gamble@faegredrinker.com; vance.wittie@faegredrinker.com; Moshe S. Maimon <MMaimon@levylaw.com>; Jerome Block <JBlock@levylaw.com>

Subject: FWC - Challenge (3) to "Confidential" Designations

Counsel for Veolia:

Please see correspondence attached related to the above-referenced matter.

Best,

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